

CRAIG A. NEWBY (NSBN 8591)
 McDONALD CARANO WILSON LLP
 2300 West Sahara Avenue, Suite 1200
 Las Vegas, Nevada 89102
 Telephone: 702.873.4100
 Facsimile: 702.873.9966
 cnewby@mcdonaldcarano.com

RYAN G. BAKER (*pro hac vice*)
 BAKER MARQUART LLP
 10990 Wilshire Boulevard, Fourth Floor
 Los Angeles, California 90024
 Telephone: 424.652.7800
 Facsimile: 424.652.7850
 rbaker@bakermarquart.com

Attorneys for Plaintiffs and Counter-defendants
Hologram USA, Inc., MDH Hologram
Limited and Uwe Maass

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

HOLOGRAM USA, INC., a Delaware corporation;
 MUSION DAS HOLOGRAM LIMITED, a
 corporation organized under the laws of the United
 Kingdom; and UWE MAASS, an individual,

Plaintiffs,

v.

PULSE EVOLUTION CORPORATION, a Nevada
 corporation; PULSE ENTERTAINMENT
 CORPORATION, a Delaware corporation; JOHN
 C. TEXTOR, an individual; DICK CLARK
 PRODUCTIONS, INC., a Delaware corporation;
 JOHN BRANCA and JOHN MCCLAIN, Executors
 of the Estate of Michael J. Jackson; MJJ
 PRODUCTIONS, INC., a California corporation;
 MUSION EVENTS LTD., a United Kingdom
 private company; MUSION3D LTD., a United
 Kingdom private company; WILLIAM JAMES
 ROCK, an individual; IAN CHRISTOPHER
 O'CONNELL, an individual; and DOES 1 through
 10,

Defendants.

Case No.: 2:14-cv-00772-GMN-NJK

**JOINT STIPULATION TO EXTEND
 TIME FOR PLAINTIFFS AND
 COUNTER-DEFENDANTS TO
 RESPOND TO THE COUNTERCLAIMS
 FILED BY IAN CHRISTOPHER
 O'CONNELL, MUSION EVENTS LTD,
 MUSION 3D LTD, MUSION IP LTD.,
 AND HOLICOM FILM LTD.**

(First Request)

AND ORDER THEREON

1 Pursuant to Fed. R. Civ. P. 6(b)(1)(B), LR 6-1, LR 6-2, and LR 7-1, Plaintiffs and Counter-
2 defendants Hologram USA, Inc., MDH Hologram Ltd. and Uwe Maass (collectively, "Counter-
3 defendants"), on the one hand, and Counter-claimants Ian Christopher O'Connell, Musion Events
4 Ltd., Musion 3D Ltd., Musion IP Ltd. and Holicom Film Ltd. (collectively, the "UK Counter-
5 claimants"), by and through the undersigned counsel, hereby stipulate to a three-week extension on
6 the deadline for Counter-defendants to file a response to the counterclaims asserted by the UK
7 Counter-claimants, from **Thursday, July 16, 2015 to Thursday, August 6, 2015**.

8 Federal Rule of Civil Procedure 6(b)(1) allows this Court to extend the time "with or without
9 motion or notice if the court acts, or if a request is made, before the original time or its extension
10 expires" "for good cause." Based on the circumstances set forth below, good cause exists for this
11 Court to provide the requested extension.

12 On June 22, 2015, the UK Counter-claimants filed counterclaims against the Counter-
13 defendants. (Dkt. 245.) Under the federal rules, Counter-defendants' response to the counterclaims
14 was due on Thursday, July 16, 2015. Due to a scheduling mistake, Counter-defendants' counsel
15 inadvertently failed to properly note the deadline to file a response and did not realize that the
16 deadline to respond had passed until after Friday, July 17, 2015. Upon discovery of this error,
17 Counter-defendants' counsel diligently investigated the matter, and met and conferred with counsel
18 for the UK Counter-claimants to extend the time to respond.

19 The parties agree that there is no prejudice to any party resulting from the three week
20 extension requested herein. At present, the next deadline in this case is August 18, 2015 when the
21 parties are scheduled to participate in a mandatory Pre-Claim Construction Settlement Conference.
22 (See Dkt. 244.) Counter-defendants seek to file their response approximately two weeks earlier on
23 August 6, 2015, which will give the parties and this Court plenty of time to prepare for the settlement
24 conference.

25 Counter-defendants are acting in good faith and seek a three-week extension of time in order
26 to continue their factual and legal investigation into the 15 counterclaims asserted by the UK
27 Counter-claimants. To prepare their response to these counterclaims, it is necessary for Counter-
28

1 defendants to investigate the facts and circumstances relating to these counterclaims, including five
2 patents and two trademarks not previously at issue in this action. (See Dkt. 245.) To conduct this
3 investigation, Counter-defendants' counsel need to coordinate with three clients, including two clients
4 located overseas and foreign counsel for their clients. Specifically, Counter-defendants' counsel has
5 been advised that the primary attorney representing plaintiff and counter-defendant Uwe Maass in an
6 arbitration in London is not generally available until the week of July 27, 2015 due to a vacation.
7 Additionally, the lead attorney for Counter-defendants in this action, Ryan Baker, is currently
8 engaged in a trial in the Central District of California that is expected to run through the rest of this
9 week. Under these circumstances, there is good cause for a three-week extension. This stipulation is
10 the first request for an extension.

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Accordingly, Counter-defendants and the UK Counter-claimants jointly request that the Court extend the **July 16, 2015** deadline to respond to the counterclaims by three weeks until **August 6, 2015**.

RESPECTFULLY SUBMITTED this 23rd day of July 2015.

McDONALD CARANO WILSON LLP

By: /s/ Craig A. Newby
CRAIG A. NEWBY (#8591)
2300 W. Sahara Avenue, #1200
Las Vegas, Nevada 89102
Telephone: 702.873.4100
Facsimile: 702.873.9966
cnewby@mcdonaldcarano.com

RYAN G. BAKER (*pro hac vice*)
BAKER MARQUART LLP
10990 Wilshire Boulevard, Fourth Floor
Los Angeles, CA 90024
Telephone: 424.652.7800
Facsimile: 424.652.7850
rbaker@bakermarquart.com
smmalzahn@bakermarquart.com

*Attorneys for Plaintiffs and Counter-defendants
Hologram USA, Inc., MDH Hologram Limited
and Uwe Maass*

SAN DIEGO IP LAW GROUP LLP

By: /s/ James V. Fazio, III
JAMES V. FAZIO, III
California Bar No. 183353
12526 High Bluff Drive, Suite 300
San Diego, California 92130
Telephone: 858.792.3446
Facsimile: 858.792.3501
jamesfazio@sandiegoiplaw.com

*Attorneys for UK Defendants and
Counterclaimants, Ian Christopher
O'Connell, Musion Events Ltd., Musion 3D
Ltd., Musion IP Ltd. and Holicom Film Ltd.*

IT IS SO ORDERED.



Gloria M. Navarro, Chief Judge
United States District Court

DATED: 07/23/2015.